

Missing Interrogatories & Deposition Documents as Requested by Plaintiffs
20 CV 1660

DATE REQUESTED	DOCUMENT REQUESTED	No. of Req.	OUTSTANDING DOCUMENTS
6/26/21	<p>Plaintiff's 1st RFP & Interrogatories as to ALL Defendants</p> <p>Inter No. 1 : Identify the names, job titles, email address, phone numbers, badge numbers, or ID's of all the people who had access to or received the TPR Target/Protestor List from 6/1/20 – 6/24/21.</p>	Inter. #1	<p><u>UPDATE BELOW – STILL MISSING as of January 17, 2022</u></p> <p>Plaintiffs received a response from then witness Dominick Ratkowski on 7/26/21.</p> <p>Witness Jalal Ali provided a response on 12/21/21.</p> <p>At the time of this interrogatory Defendants Dennis McBride, Barry Weber, and City of Wauwatosa were the only named parties. Both McBride and Weber have never answered this interrogatory to date.</p>
6/26/21	<p>Inter No. 2 :</p> <p>Identify the dates and times that the Protestor List (PL) as well as any and all updates to the PL was given to any and all companies, governmental entities, non-governmental agencies, law enforcement agencies, persons who had access to/and or received any version of the PL created by Mr. Ratkowski from 6/1/20 to 6/24/21</p>	Inter. #2	<p><u>UPDATE BELOW – STILL MISSING as of January 17, 2022</u></p> <p>Plaintiffs received a response from then witness Dominick Ratkowski on 7/26/21.</p> <p>At the time of this interrogatory Defendants Dennis McBride, Barry Weber, and City of Wauwatosa were the only named parties. Both McBride and Weber have never answered this interrogatory to date.</p>
6/26/21	Inter. No. 3 :	#3	<u>UPDATE BELOW – STILL MISSING as of January 17, 2022</u>

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	What are the social media handles used and/or created by the City of Wauwatosa employees as well as the WPD officers and employees, such as on facebook, twitter, Instagram, reddit, viper, and any other social media sites as well as email addresses used to survey and/or engage with any persons on the PL as labeled as Exhibit #1 for the deposition of Dominick Ratkowski on June 23, 2021		<p>Defendant Ratkowski sent his first response to this interrogatory which was not signed by Attorneys nor signed by Ratkowski on 11/1/21, and then amended his answer again on 1/5/22.</p> <p>On 11/16/21 Defendant Ratkowski sent his 1st amended response.</p> <p>Defendant Ratkowski sent his 2nd amended his response on 1/5/22.</p> <p>At the time of this interrogatory Defendants Dennis McBride, Barry Weber, and City of Wauwatosa were the only named parties. Both McBride and Weber have never answered this interrogatory to date.</p>
9/16/21	<p>Plaintiff's 2nd Req. for Interrogatory & RRP of Docs as to ALL Defendants</p> <p>Inter. No. 1 : Please produce a list of any and all persons and/or entities to whom the Defendants, any members of the WPD, any city of Wauwatosa elected official, any City of Wauwatosa employees gave or provided access to the TPR Target List aka and also represented as the Protestor List and/or Protestor Folder in any and all configurations. This must include identifying the complete contact information</p>	Inter. #1	<p><u>UPDATE BELOW – STILL MISSING as of January 17, 2022</u></p> <p>NONE of the Defendants have EVER responded to this interrogatory to date. Defendants who did not respond are:</p> <ol style="list-style-type: none"> 1. Barry Weber 2.. Dennis McBride 3. Luke Vetter 4. Jeffrey Farina 5. Shane Wrucke 6. Martin Keck 7. Joseph Lewandowski 8. Joseph Roy 9. Dominick Ratkowski 10. Kathy Causier 11. George Schimmel

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	for any person and/or any entity who received or had access to the List and/or folder; who gave/provided access; the date it was given/provided; the date such was received; and specific identifying criteria, including badge number or the like.		
7/27/21	<p>Archambo, James – Deposition Req. for Documents –</p> <p>Req. #3 - Your most recent employment contract 2.08.090 and job description which includes duties, responsibilities, expectations, rubric for evaluation (blank); and/all other condition of employment</p>	Req. #3	Defendants have not produced documents responsive to this request.